## EXHIBIT 2

## IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

HANSHOW TECHNOLOGY CO.,	§	
LTD. AND SHANGHAI HANSHI	§	
INFORMATION TECHNOLOGY	§	
CO., LTD	§	
	§	Case No. 2:23-cv-00617-RWS-RSP
Plaintiffs,	§	
	§	
V.	§	
	§	
SES-IMAGOTAG SA, SES-	§	
IMAGOTAG GMBH AND	§	
CAPTANA GMBH	§	
	§	
Defendants.	§	

## **DECLARATION OF JESSICA VITTORIO**

- 1. My name is Jessica Vittorio. I am over the age of 21 years old, and I have never been convicted of a felony. I am of sound mind, and I am otherwise competent to make this Declaration. For the limited purpose of stating facts in support of Captana GmbH's Motion to Dismiss for Lack of Personal Jurisdiction, I have been designated as the corporate representative of Captana GmbH. The facts stated in this Declaration are within my personal knowledge and are true and correct.
- 2. I oversee all legal aspects of commercial activities and operations for VusionGroup SA in the United States. Because of this, I have working knowledge of how sales are effectuated amongst the defendants and other affiliates of VusionGroup SA, including the structure of those companies, and the manufacturing, customs, and other logistics involved in U.S. sales of the accused products in this case.

3. VusionGroup SA (f/k/a SES-imagotag SA) is a French corporation and the parent company of Defendant Captana GmbH.

Document 38-2

- 4. VusionGroup SA is a technology developer that sells its products in Europe. One such device is the Captana<sup>TM</sup> sensor and camera system.
- 5. Captana GmbH ("Captana") is corporation organized and existing under the laws of Germany.
- 6. Although it is a wholly owned subsidiary of VusionGroup SA, Captana GmbH is a legally distinct entity from Defendants VusionGroup SA (f/k/a SES-Imagotag SA) and VusionGroup GmbH.
  - 7. Captana GmbH began as a technology startup known as Findbox.
  - 8. SES-Imagotag SA acquired a controlling interest in Captana GmbH in 2017.
- 9. Captana GmbH has been an independent, operational company and brand before and after SES-imagotag SA's acquisition. It develops its own technologies and has maintained largely uninterrupted leadership, with Michael Unmussig serving as its CEO since its founding.
  - 10. Captana GmbH develops technology that is used in the Captana<sup>TM</sup> products.
- 11. Captana GmbH does not maintain a place of business or employees in the United States or the State of Texas.
- 12. Captana GmbH does not sell, advertise, import, or make the Captana<sup>TM</sup> devices in Texas or the United States.
- 13. My name is Jessica Vittorio. My date of birth is February 6, 1991. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Case 2:23-cv-00617-RWS-RSP Document 38-2 Filed 04/25/24 Page 4 of 4 PageID #: 461

Executed on the 25th day of April 2024.

Jessica Vittorio